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June 8, 2021


STATUS REPORT AND
LETTER-MOTION TO BE RELIEVED AS COUNSEL

Served and Filed via ECF

Hon. Naomi Reice Buchwald, Senior U.S.D.J.
Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
June 10, 2021

Re: United States v. Tsani Russell, 19-cr-554(NRB)

Dear Judge Buchwald:

Counsel respectfully submit this combined status report and letter-motion for Your Honor's consideration. The letter-motion seeks an order relieving counsel of further representation of Mr. Russell.

By way of status, and to supplement counsel's submission of May 18, 2021 (ECF-49), it is counsels' understanding that the next status conference will be scheduled for either June 14 or 16, and that the specific date and time are pending confirmation.

In support of the motion to be relieved, Your Honor is respectfully advised of the following circumstances. The face-to-face meeting with Mr. Russell and counsel—the necessity of which was discussed in the May 18 submission—has now taken place. Without elaboration, the takeaway is that Mr. Russell is insisting on a course of action that, in counsels' judgment, raises ethical issues regarding counsels' ability to continue to represent him. There have been follow-up conversations, and the reality is that counsel cannot persuade Mr. Russell that we cannot ethically support his proposed course of action. Under the circumstances, we cannot continue.

HON. NAOMI REICE BUCHWALD, U.S.D.J.

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Your Honor's time and attention to this matter are appreciated.

Respectfully yours,

/s/ David A. Ruhnke

David A. Ruhnke (Ruhnke & Barrett)

/s/ Diane Ferrone

Diane Ferrone (Law Offices of Diane Ferrone)

Counsel to Tsani Russell

Via ECF: Jeffrey Coffman, A.U.S.A.

Via USPS: Tsani Russell